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12 HITACHI, LTD.

13  
14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 IN RE: CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

19 This Document Relates To:

20 *All Actions.*  
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DECLARATION OF KAZUO HATANAKA  
IN SUPPORT OF HITACHI, LTD.'S  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT ON DUE PROCESS  
GROUND

DECLARATION OF KAZUO HATANAKA IN  
SUPPORT OF HITACHI, LTD.'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON DUE PROCESS GROUNDS

CASE NO.: 3:07-cv-05944-SC  
MDL No.: 1917

1 I, Kazuo Hatanaka, hereby declare:

2 1. I am over the age of eighteen. I have personal knowledge of the facts and matters  
3 stated herein and, if called, could and would testify competently to them. Although English is not  
4 my native language, I fully understand the contents of this Declaration.

5 2. I am currently employed by Hitachi, Ltd. ("HTL") as Advisor, Liquid Crystal Display  
6 Division.

7 3. HTL is a Japanese corporation with its principal place of business at 6-6, Marunouchi  
8 1-chome, Chiyoda-ku, Tokyo, 100-8280, Japan.

9 4. Prior to December 2001, HTL manufactured cathode ray tubes ("CRTs") in plants  
10 located in Japan, Singapore, and Malaysia. Prior to October 1, 2002, HTL sold color display tubes  
11 ("CDTs") to CRT Product manufacturing facilities located within the United States. Sometime prior  
12 to March 1, 1995, HTL sold color picture tubes ("CPTs") to CRT Product manufacturing facilities  
13 located within the United States. HTL sold CRT monitors in the United States during the Relevant  
14 Period. HTL did not sell CRTs to consumers because CRTs are not a standalone product.

15 5. Based on the information reasonably available to HTL today, at all times HTL's CRT  
16 manufacturing facilities were located exclusively outside of the United States.

17 6. Based on the information reasonably available to HTL today, HTL has no offices in  
18 Arizona, California, Florida, Illinois, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska,  
19 Nevada, New York, New Mexico, North Carolina, or Wisconsin (collectively, the "Relevant States").

20 7. Based on the information reasonably available to HTL today, HTL does not own  
21 property in the Relevant States and HTL has not acquired or leased property in the Relevant States.

22 8. HTL has never held any formal meetings of its directors or shareholders in the  
23 Relevant States.

24 I declare under penalty of perjury under the laws of California that the foregoing is true and  
25 correct. Executed on the 5th day of November, 2014 in Tokyo, Japan.

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